

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	No. 1:23-cr-10186-ADB
v.)	
)	
)	
JOAN AVALO-QUEZADA)	

DEFENDANT JOAN AVALO-QUEZADA'S
INDIVIDUAL STATUS REPORT

Now comes the counsel for the Joan Avalo-Quezada in the above-entitled matter, before this Honorable Court, and respectfully submits this individual status report pursuant to the Court's order. (Dkt. No. 377).

A. STATUS OF DISCOVERY RECEIPT AND REVIEW

1. Discovery produced to date by the United States has been voluminous. Defense counsel understands that he has received all discovery produced in this matter.
2. Counsel for Mr. Avalo-Quezada did encounter issues in getting discovery to Mr. Avalo-Quezada. Counsel has provided copies of all non-protective order materials relevant to Mr. Avalo-Quezada to him. Otherwise, however, he has had difficulty getting access to discovery subject to the protective order. Mr. Avalo-Quezada was held at Wyatt Detention Facility for a period of time and did not have access to discovery subject to a protective order during that time. He has since been transferred to Plymouth County House of Corrections.
3. Instant counsel made arrangement for the discovery coordinator to prepare a hard drive of discovery for the defendant that would be held by jail staff at Plymouth and for Mr. Avalo-Quezada to be given access to. Mr. Avalo-Quezada was recently able to start reviewing these materials.
4. To the extent that there are any discovery materials that are not on the hard drive that Mr. Avalo-Quezada needs access to, counsel is making arrangement for any such

materials to be produced through the discovery coordinator, and counsel believes that the assistance of the Court in facilitating this will not be necessary.

B. MOTION PRACTICE

1. Mr. Avalo-Quezada notes for this Court that he has a pending motion to suppress evidence obtained from a motor vehicle stop in related matter 1:24-cr-10281-IT before Judge Talwani.
2. Should that motion be denied, Mr. Avalo-Quezada expects to be filing an additional motion to suppress (the search of a cell phone) in that related matter.

C. READINESS TO GO TO DISTRICT COURT JUDGE

1. Mr. Avalo-Quezada reports through counsel that, as to the charges against him, the defense is ready for the matter to be referred to Judge Burroughs.
2. Mr. Avalo-Quezada would therefore be ready for a pretrial conference in October.

Respectfully submitted,

Counsel for the defendant,

/s/ Jason Benzaken

Jason Benzaken, Esq.
Benzaken, Maguire, Sheehan & Wood, LLP
1342 Belmont Street, Suite 102
Brockton, MA 02301
(Tel) 508-897-0001
(Fax) 508-587-5455
BBO No. 658869
jbenzaken@bmswlaw.com

Dated: September 18, 2025

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion has been served upon the parties to this matter and counsel for the United States through CM/ECF.

/s/ Jason Benzaken

Dated: September 18, 2025